

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SAN ROCCO THERAPEUTICS, LLC,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 21-1478 (RGA)
)	
BLUEBIRD BIO, INC. and)	
THIRD ROCK VENTURES, LLC,)	
)	
Defendants.)	

**STIPULATION AND [PROPOSED] ORDER
TO AMEND SCHEDULING ORDER DEADLINES**

WHEREAS, fact discovery is currently set to close on May 30, 2024 (D.I. 101);

WHEREAS, the parties have conferred and believe that additional time is needed to complete fact discovery, including to address potential discovery disputes; and

WHEREAS, the parties agree, subject to the approval of the Court, that certain amendments to the existing case schedule are warranted in order to allow for an extension of the deadline for completion of fact discovery, including a corresponding extension of the dates for the pretrial conference and trial.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the parties, through their undersigned counsel and subject to the approval of the Court, that the following deadlines in the Scheduling Order (D.I. 101) shall be amended as follows:

Event	Current Deadline	Proposed Deadline
Close of fact discovery	May 30, 2024	July 25, 2024
Opening expert reports	July 2, 2024	September 6, 2024
Responsive expert reports	August 20, 2024	October 25, 2024
Reply expert reports	September 20, 2024	November 22, 2024

Deadline to raise timeliness of notice or scope issues with reply expert reports	September 27, 2024	December 2, 2024
Close of expert discovery	October 30, 2024	January 6, 2025
Case dispositive and Daubert motions	December 6, 2024	February 7, 2025
Pretrial conference	April 11, 2025	June, July, or August __, 2025 (or otherwise at the convenience of the Court)
Trial	April 21, 2025	June, July, or August __, 2025 (or otherwise at the convenience of the Court)

Pursuant to D. Del. LR 16.4, counsel for the parties certify that they have sent a copy of the foregoing request to their respective clients.

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Inc. and Third Rock Ventures, LLC*

April 15, 2024

SO ORDERED this _____ day of _____, 2024.

UNITED STATES DISTRICT JUDGE